

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

MEDICAL PROPERTIES TRUST, INC.,

Plaintiff,

v.

VICEROY RESEARCH LLC, *et al.*,

Defendants.

Case No. 2:23-cv-00408-RDP

**DEFENDANTS' SUPPLEMENTAL EXHIBIT IN SUPPORT OF BRIEF ON DISCOVERY
ISSUES TO BE ADDRESSED AT THE MARCH 13, 2024 STATUS CONFERENCE**

Defendants supplement their prior briefing (ECF No. 87) with one additional exhibit: a letter from Senators Elizabeth Warren and Edward J. Markey to Ralph de la Torre (RDLT) dated March 7, 2024. *See* Ex. 23. Defendants' counsel did not see this letter, written one day before the brief was filed, prior to filing the brief. This letter further describes the public health crisis that Plaintiff Medical Properties Trust ("MPT"), RDLT, and Cerberus Capital Management ("Cerberus") have created in Massachusetts, and describes these parties' delays and obfuscation in providing information about their financial relationships. This letter demands some of the very same documents that Defendants seek to share and discuss with the Senators. Given that Defendants have the documents, are intimately familiar with them, and that the other parties appear to have no intention of producing these documents to the Senators any time soon, Defendants respectfully submit that it is imperative that they be allowed to share the documents with the Senators' offices.

Respectfully submitted this 11th day of March, 2024.

/s/ Richard M. Elias

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed a true and correct copy of the foregoing, using the Court's CM/ECF system, which will automatically send email notification to all counsel of record.

/s/ Richard M. Elias

Richard M. Elias